position in the local exchange market to dictate unreasonable rates, terms and conditions for interconnection with the paging carriers, and to delay the introduction of advanced services or service improvements.

Paging carriers have not yet been accorded by the LECs the co-carrier status that the Commission recognized years ago. As a result, in most instances of which PageNet is aware, paging carriers continue to be charged excessive rates, are required to pay for facilities which the paging carriers do not need in order to offer their services, and are charged by almost every LEC for facilities which are already fully paid for by the originating end user. In short, the interconnection obligations imposed on the LECs by this Commission have been consistently ignored, thereby undermining the public benefits the Commission has sought to achieve on behalf of telecommunications consumers. The Commission must use the opportunity provided by the instant proceeding to eliminate unreasonable LEC pricing practices and delaying tactics, and to establish reasonable and effective CMRS interconnection arrangements.

1. The LECs' Practice Of Charging The Paging Carrier For The Facility Between The LEC Central Office And The MTSO Constitutes An Unreasonable Practice.

One perverse strategy almost universally applied by the LECs has been to ignore the co-carrier status of paging carriers and

to treat them as customers of LEC access service. As a result of this practice, the LECs are double-recovering -- and in some cases triple-recovering -- charges for facilities that are paid for by the originating end user. This flagrant over-recovery is illustrated in Diagram 2, *infra*. That diagram illustrates a typical call route for a local or interstate tandem-switched call that originates on the LEC network, and terminates on the LEC network, or on the wireless network of a paging carrier, and identifies the LEC tariffed rates that are associated with each segment of the transmission.

As Diagram 2 depicts, in each case, the transmission segment between the LEC tandem office and the terminating office (be it the LEC's end office or the paging carrier's MTSO) is provisioned by the LEC *and is paid for by the originating end user*. If the originating portion of the call is interstate or interLATA, *i.e.*, is routed through an interexchange carrier network, the IXC pays the LEC for the tandem switched transport segment that includes the tandem/end office link,[47] and passes the charge through to

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[47] Some LECs do not charge the IXC for the link between the tandem and the CMRS MTSO (or for end office switching). The image of fairness which absence of charges seems to create is, in truth, an illusion. Often, the net switched access transport (dedicated transport and tandem switched transport elements) distance from the IXC's POI (point of interchange) to a terminus at the CMRS Type 2A serving LEC tandem will be as great or even greater than if the CMRS MTSO were treated by the LECs as the network terminating end office it truly

Continued on following page

the originating end user customer. In the case of a local transmission, the LEC collects the charges that recover the cost of the interoffice link directly from the originating end user. In either case, however, the transmission segment to the terminating end office or paging carrier MTSO is fully paid for by the originating end user.

In a typical paging interconnection arrangement, however, the paging carrier is forced to pay the LEC an additional charge -- typically a flat rate charge for a dedicated or virtual dedicated circuit between the tandem and the MTSO. This practice constitutes flagrant double-recovery by the LEC and is wholly unjustified. Even more outrageous, several LECs further require the paging carrier to pay an additional per minute-of-use charge for the same facility, resulting in a "triple dip" by the LEC for

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Continued from previous page

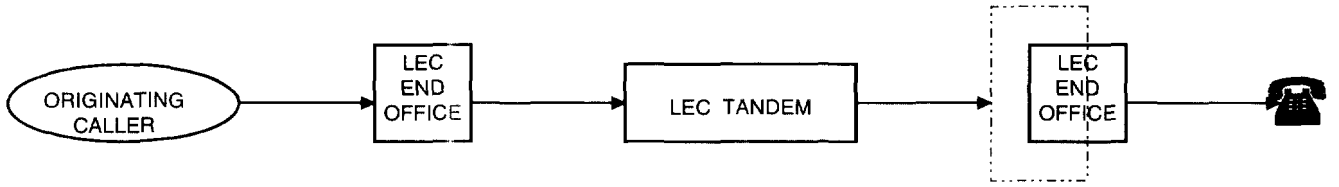
is. Accordingly, the LEC's revenue is even more excessive. Plus, by unilateral LEC action, CMRS providers are being denied terminating (and originating, where appropriate) revenues from IXC traffic. The LECs routinely pass access traffic to CMRS providers without benefit of an access service request (ASR) or any other documentation to authorize carriage of the traffic and/or enable ticketing, reporting, and billing arrangements which would permit the CMRS provider to share in the access revenue stream. Revenue sharing with CMRS providers could be accommodated either through the CMRS provider directly billing the IXC if IXC traffic can be reasonably identified to the CMRS provider situated behind the LEC tandem, or through one of the extant multi-LEC access revenue allocation/compensation mechanisms, such as meet-point billing.

the same transmission segment. These LEC pricing practices are discussed in the Affidavit of Vic Jackson, appended as Appendix C. These pricing practices not only grossly inflate the cost of paging interconnection, they provide excessive and unjust compensation to the LEC. The Commission must prohibit this practice.

DIAGRAM 2

CALL ROUTING AND COST COVERAGE BY LEC

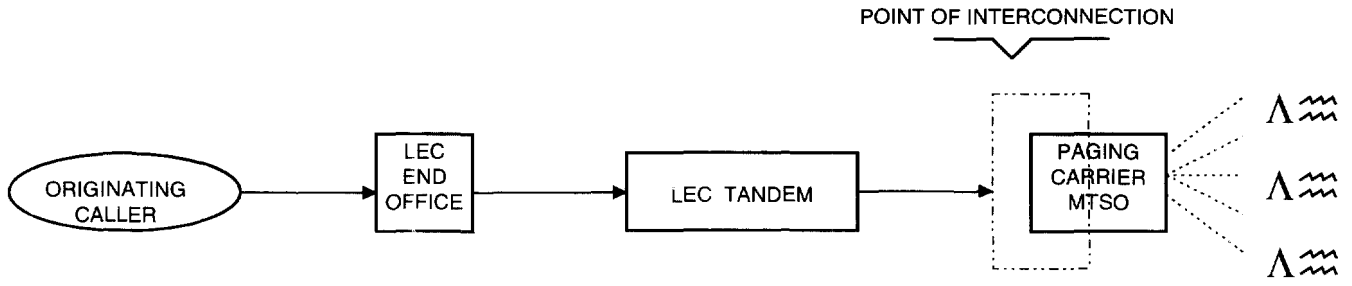
LEC-PROVIDED TERMINATION -- LOCAL CALL



1

COSTS COVERED BY LEC CHARGES TO END USERS

PAGING CARRIER TERMINATION -- LOCAL CALL



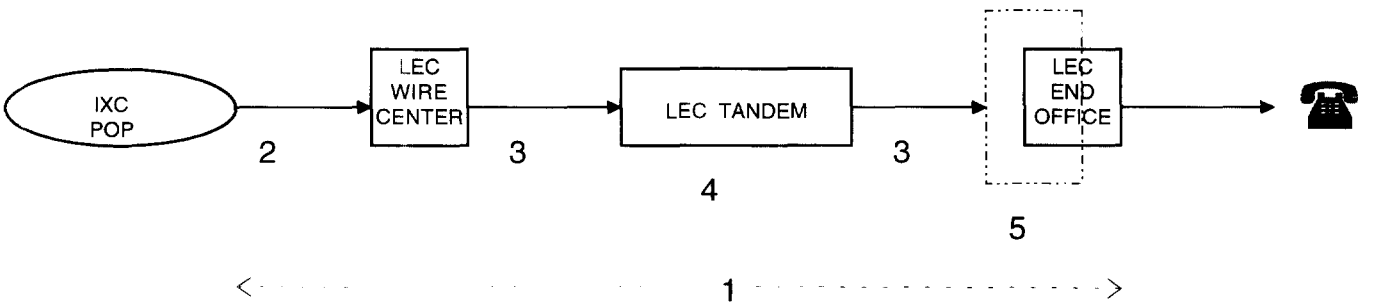
1

COSTS COVERED BY LEC CHARGES TO END USERS

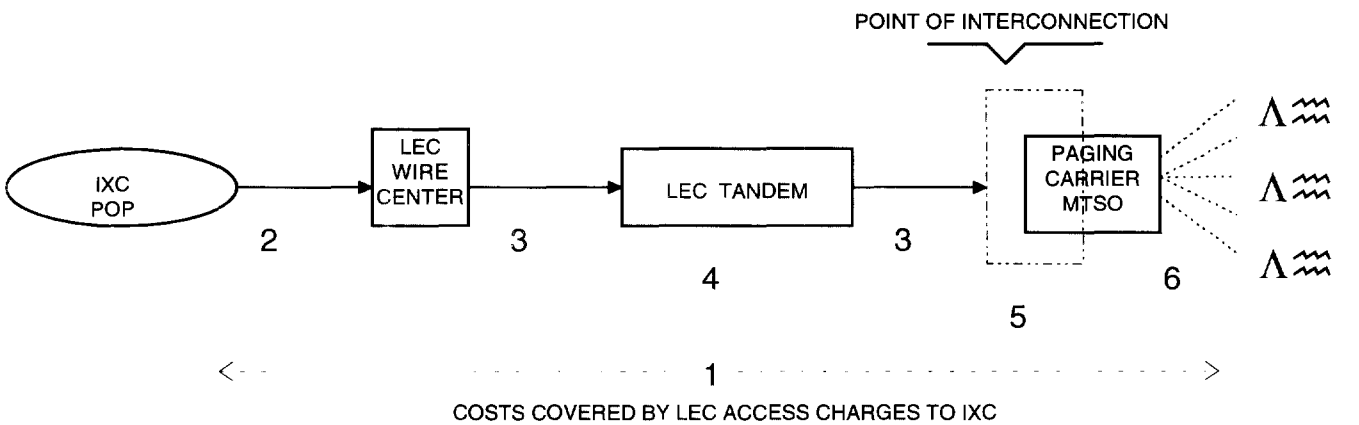
1 = LEC Basic Local Service Flat Rate

CALL ROUTING AND COST COVERAGE BY LEC

LEC-PROVIDED TERMINATION -- LONG DISTANCE CALL



PAGING CARRIER TERMINATION -- LONG DISTANCE CALL



2 = LEC Entrance Facility
3 = LEC Tandem Switched Transport
4 = LEC Tandem Switching
5 = LEC Terminating Local Switching
6 = Paging Carrier switching and local transport functions and charges

2. The Commission Must Withdraw Its Tentative Proposal To Treat The Link Between The LEC Tandem And The MTSO As An Entrance Facility.

The Commission tentatively has concluded that "rates for dedicated transmission facilities connecting LEC and CMRS networks should be set based on existing access charges for similar transmission facilities."[48] This approach to compensation for interconnection between LECs and paging carriers is entirely inappropriate because it does not accurately reflect the network function provided by the LEC, and more importantly, because the LEC is already being fully compensated for providing this transport segment by the charges to customers of the LEC.

These points are illustrated in the call routing arrangement depicted in Diagram 2, from the previous subsection. As discussed in the preceding section, Diagram 2 illustrates the routing of a typical tandem switched call, and identifies the network function provided by each carrier involved in completing the call and the revenue source for each function provided.

In such a typical call scenario, the LEC-provided services on both the originating and terminating ends of the call are compensated by LEC access charges that are imposed upon and paid by the IXC, if the call is handled by an IXC, or that are paid

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[48] NPRM at ¶ 3.

directly to the LEC if the call is not. In the former case, the IXC passes these charges through to the end user customer that originates the call.[49] In the latter case, the originating caller pays the LEC directly. In either case, the originating end user customer fully compensates the LEC for performing all switching and transport functions between the originating caller location and the LEC's terminating end office, or its equivalent.

As Diagram 2 makes clear, in the case of a paging call, the originating end user customer pays the same charges to the LEC that are paid in a LEC-terminated call. The LEC costs associated with providing the link between the LEC tandem and the paging carriers' MTSO for an IXC-originated call are fully recovered in the tandem switched transport charge paid by the end user (through the IXC), just as they are in the case of a call terminated on the LEC network.[50] Significantly, the diagram also makes clear that the Commission's assumption that "the dedicated transport facilities used to connect LEC and IXC networks are similar or identical to the facilities connecting LEC and CMRS

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[49] If an IXC is not used to provide interstate routing, all rate elements are collected directly by the LEC from the end user.

[50] In fact, costs associated with the "trunk side" of the LEC terminating end office or the paging MTSO are also equally covered.

networks"[51] is incorrect. Rather than the entrance facility (which typically provides the link between and IXC and LEC network) the link between the MTSO and the LEC network is functionally identical to the LEC's tandem switched transport element. The LEC is fully compensated for providing this transport segment by the originating end user's payment -- through the IXC -- of the LEC's tandem switched transport charge to the IXC.

The fact that LECs are compensated for the tandem/MTSO link reflects common business practice -- LEC services typically are ordered in reference to end points, and the LEC assumes responsibility for the transmission path between the requested points of origination and termination.[52] In the case of a LEC-provided termination, the end point is the terminating party's location, and the "originating" LEC delivers the traffic to the end office serving that location as an integral part of its

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[51] NPRM at ¶ 64.

[52] Customers with unique needs may depart from this practice and request control over the specific route that the transmission takes. In this case, they specify the end offices or tandems through which they want the traffic routed. Such requests are treated as service options and carry an additional charge. The tariffed rate elements that reflect these additional charges typically are termed Alternate Route Diversity, Alternate Serving Wire Center, or Other-Than-Normal Call Routing.

service.[53] In the case of a call terminating to a paging carrier's customer, the paging carrier's MTSO replaces the "terminating" LEC's end office, and the "originating" LEC delivers the traffic to the MTSO as an integral part of its service. The functions that the "originating" LEC provides are identical in both cases, and the attendant form of compensation to both the "originating" and "terminating" LEC -- payment by the originating customer -- should also be identical in both cases.

This compensation structure is fully consistent with the Commission's Part 69 Rules for access services. Section 69.111(d) defines tandem-switched transport as the transmission path between the LEC tandem and the end office serving the terminating location. As Diagram 2 illustrates, for example, under Type 2 interconnection, traffic routed to a paging carrier's network does not transit a LEC terminating end office, but is routed directly from the LEC tandem to the paging carrier's MTSO. The costs associated with this transmission path are therefore recovered through the tandem-switched transport charge (or the direct-trunked transport charge if a dedicated facility is employed) and ultimately are paid by the end user customer that originates the call.

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[53] This applies both to situations in which one LEC provides full end-to-end service, and in which different LECs are involved in provisioning the call.

In fact, this compensation structure for local exchange traffic is already reflected in interconnection tariffs filed by New York Telephone and as proposed by Ameritech in its five-state region. As described in the Affidavit of Vic Jackson in Appendix C, both of these LECs have concluded that they are responsible for providing the transport link between their tandem offices and PageNet's MTSOs. PageNet submits that a similar provision should govern all LEC/paging carrier interconnection agreements. Failure to do so effectively will allow LECs to continue to double-recover the cost of this transmission link in violation of the Commission's stated policy goals and the dictates of the 1934 and 1996 Acts.

Despite the refusal of most LECs to accept their own responsibility for their own traffic in the paging context, some have clearly recognized the responsibility of co-carriers for the traffic they originate from the point of origination to the point of interconnection with the other co-carrier in the CMRS arena. For example, in Bell Atlantic territory, in the cellular interconnection agreements of which PageNet is aware, each requires the cellular carrier to subscribe to Bell Atlantic for the facility between the MTSO and the LEC central office. Under these agreements, however, the cellular carriers are appropriately required to pay Bell Atlantic for calls originated on the cellular network as it is the cellular carrier's

responsibility to carry the traffic to the point at which it interconnects with the LEC, in this instance to the LEC CO. The subscription rate is set based on the percentage of traffic originating with the cellular carrier. Conversely, under these agreements, the cellular carrier is not required to pay for the facility insofar as the facility is used for the transport of calls which originate on the landline network and terminate on the wireless network.

These Agreements reflect a movement toward the appropriate division of responsibility between cellular and landline co-carriers; yet Bell Atlantic has not been willing to adopt the same conceptual framework for paging co-carriers. Further, Bell Atlantic has not even been willing to allow paging carriers to subscribe to the cellular interconnection offerings they make available to the paging carrier's cellular competitors. It has refused in spite of the Commission's admonition, as reflected in the NPRM, that a "LEC may not deny to a CMRS provider any form of interconnection arrangement that a LEC makes available to any other carrier or other customer, unless the LEC meets its burden of demonstrating that the provision of such interconnection is either not technically feasible or economically reasonable" (NPRM at ¶ 21).

IV. APPLICATION OF THESE PROPOSALS

As discussed throughout these comments, the Commission's policy goals and the Communications Act, as amended by the Telecommunications Act of 1996, require the establishment of reasonable interconnection and termination compensation arrangements for paging carriers. These interconnection arrangements require the following:

1) The Commission should make clear that LECs may not impose upon paging carriers any charges for the inter-carrier transmission link between the LEC's switch and the paging carrier's mobile telephone switching office.[54]

2) The Commission should require LECs to compensate paging carriers for the switching and transport functions that the paging carriers perform in terminating traffic that originates from the LEC network. The rate of compensation should be expressed as a charge per call, derived from the LECs' interstate tariffed rates.[55] The average paging call is 15 seconds (25% of

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[54] To the extent that, in the future, PageNet does originate traffic that terminates on the LEC networks, PageNet is prepared to pay the LECs reasonable compensatin for such termination.

[55] PageNet notes that, as a policy matter, and to be consistent with the costing approach adopted in the Telecommunications Act of 1996, it is far preferable to establish rates in reference to the relevant carrier's costs of providing

Continued on following page

a minute). The per-call charge should be set at 80% of one minute's charge. The 80% factor is needed in order to reflect the call setup function performed by the paging carrier.[56] For example, using access charges from BellSouth's federal tariff, the rate would be:

Continued from previous page

service. In most cases, reference to the LECs' tariffed access charges is inappropriate for the determination of co-carrier compensation. In the instant case, however, reference to LEC access charges as a surrogate for the paging carriers' costs of terminating traffic is reasonable, and indeed the only practicable means of proceeding. Unlike the LECs, paging carriers have not been subject to rate regulation, and so have not developed the accounting infrastructure required of rate-regulated carriers. Moreover, the imposition of such rate regulation upon paging carriers would constitute an expansive new form of regulation that is both unnecessary and flatly inconsistent with the letter and spirit of the Telecommunications Act of 1996.

[56] Usage-sensitive costs comprise two categories of cost, set-up costs and conversion time costs. The set-up costs are the same for each call, no matter how long, whereas conversion time costs are proportional to the duration of a call. LEC access charges do not distinguish between the two; instead, they reflect a per-minute cost based on an average call length of about 3.5 minutes per call. Therefore, the per-minute rate reflects only about 30% (1/3.5) of the set-up cost incurred. If the set-up cost is $.005 per call and conversion minute costs are $.006 per minute, the cost for a 3.5 minute call is $.026 (.005 + .0035 x .006); the average cost per minute is $.00743 (.026/3.5), which is how access charges are set. However, the cost of a 15-second call would be $.0065 (.005 + .0025 x .006). As a result, the cost of a 15 second call is 88% of the average cost of a 3.5 minute call. This is the basis for determining the percentage used to derive the per-call compensation to paging carriers.

LEC local switching charge		$.00755/minute
Plus		
LEC local transport termination charge		.00036
Plus		
LEC local transport facility charge		.00000
	Total:	$.00791/minute
	x 80% =	$.00633/call

Paging carriers reserve the right to petition the Commission to establish rates that depart from this formula, upon a showing that their unique costs justify different rates.

3) The initial standards for interconnection of LEC and CMRS carrier networks should be fully consistent with the standards established for interconnection with other carriers. When the Commission completes its proceeding to establish detailed interconnection standards -- as required by the Telecommunications Act of 1996 -- these standards should be fully and uniformly applicable to paging and other CMRS carriers.

V. CONCLUSION

For the reasons discussed above, PageNet respectfully requests that the Commission adopt rules and regulations concerning interconnection and co-carrier compensation for paging traffic in accordance with the discussion contained herein.

Respectfully submitted,

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Its Attorneys

March 4, 1996

Appendix A

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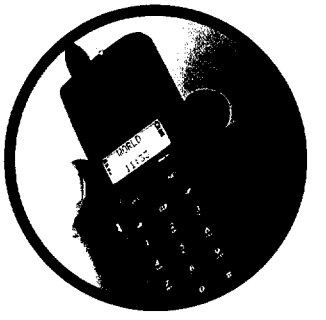
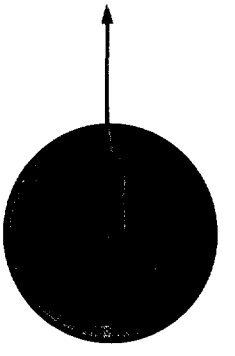
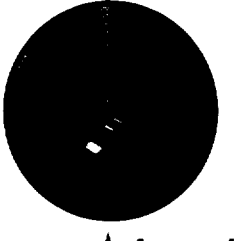
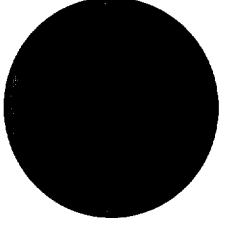




Phone



Answering Machine



Pager

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Sprint Spectrum gives you a personal phone, answering machine and pager that fits in the palm of your hand and offers the features you need:

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- Voicemail
- Text Messaging
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- Call Forwarding
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100% Digital Wireless Network

The next generation of wireless communications. Sprint Spectrum is the first Personal Communications System in the United States. Because the network is 100% digital, it gives you the highest quality, most reliable service available today for your communications needs. Digital technology is the reason Sprint Spectrum can offer you so many new features on a wireless communications system. And more great services are on the way.

Answering Machine and Pager

Stay in touch. Your handset is a personal phone with a built-in answering machine and pager. You can stay in touch even if you can't answer your phone, or it's busy or turned off. The Sprint Spectrum Answering Machine automatically answers those calls, takes messages for you and saves them until you have time to listen to them. What's more, it gives callers the option of sending you a numeric page (a phone number to call, displayed on your handset screen) instead of leaving a voice message.

The Answering Machine and Pager feature is included free of charge with every Sprint Spectrum service subscription.

Exceptional Voice Quality & Clarity

A new standard for wireless communications. Tired of poor call quality on today's cellular phones? Sprint Spectrum gives you the answer.

- Crisp, clear communications
- Virtually static-free conversations
- No "cross-talk"
- Better in-building coverage

Call Privacy and Security

Say good-bye to eavesdropping. Sprint Spectrum is the only wireless system that brings you totally private, portable communications for the peace of mind you want on every call. Now you can be sure that no one is listening in to your conversation.

Sprint Spectrum uses its unique digital technology to prevent eavesdropping and fraud by:

- Encrypting your calls — to prevent "listening in" by outsiders
- Authenticating callers during call set-ups — to prevent unregistered use of your phone number

These powerful capabilities give you complete call privacy and security, something that no other wireless communications technology can offer you today.

Features and Benefits

Caller ID

Know who's calling before you pick up. Caller ID allows you to see the number of the person who's calling you before you answer. You can decide whether or not to answer the call. Calls you do not answer will go to your Answering Machine.

To see the phone number on your handset's display screen, the call must originate from a caller within the Sprint Spectrum network or from a phone in the local calling area.

Caller ID is included free of charge with your Sprint Spectrum Service.

Voicemail

Enhanced voice messaging capabilities. Sprint Spectrum Voicemail is for everyone who needs more than basic Answering Machine service. With Voicemail, you get all the messaging features of the built-in Answering Machine, but with enhanced capacity. Plus, you'll benefit from "mailbox to mailbox" messaging, which lets you create and forward messages directly to other Sprint Spectrum subscribers. You can send messages to mailing lists that you create. And you can defer your messages for future delivery. Together, these features add up to real messaging power.

Sprint Spectrum Voicemail is available to subscribers for a low monthly fee.

Text Messaging

Ensure message delivery. With Text Messaging, you'll always get information that you need, even if you don't want to be disturbed. Callers can contact the Sprint Spectrum Message Center and leave detailed messages of up to 160 characters to be sent to your handset 24 hours a day. You will receive the messages even if your handset is turned off or you have a call in progress.

Text messaging software for your personal computer is also available. The software lets you write and send messages directly from your computer to other Sprint Spectrum subscribers.

A low monthly fee is charged for Text Messaging.

Call Waiting

For the important calls you can't afford to miss. Call Waiting makes sure that your critical calls get through. When you're on a call, you'll know when another call is waiting for you. Plus, you can make another call from your handset while you keep the first call on hold. It's like having a second line.

Call Waiting is included free of charge in some pricing plans. For others, a low monthly fee is charged. Standard airtime rates are also charged.

Call Forwarding

Send your calls where you want them. Want your calls diverted to another number? Try Call Forwarding. When you're away from your handset, or don't want to be disturbed, Call Forwarding lets you automatically send all incoming calls to a number you specify.

A low monthly fee is charged for Call Forwarding. Standard airtime rates apply.

Features and Benefits

Call Barring

Control Cost. Call Barring allows you to specify the types of calls you want to be made from (or sent to) your handset. Call Barring gives you greater control of your personal phone use and helps you avoid unwanted costs. Call Barring can be turned on or off at any time.

A low monthly fee is charged for Call Barring.

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Dial up the information you need. Sprint Spectrum Information Services give you up-to-date information about a variety of subjects. It's easy — all you have to do is dial *INFO and pick the topic that interests you from the menu provided:

- Weather
- Traffic
- News
- Horoscopes
- Sports
- Lottery Numbers
- Financial News

A special airtime rate is charged for calls made to Sprint Spectrum Information Services.

Free 911 Access

Security and peace of mind. In times of emergency you want simple, direct access to help. With Sprint Spectrum, you dial 911, just like on any other phone. There is no charge for 911 calls.

Making Your Life A Little Easier

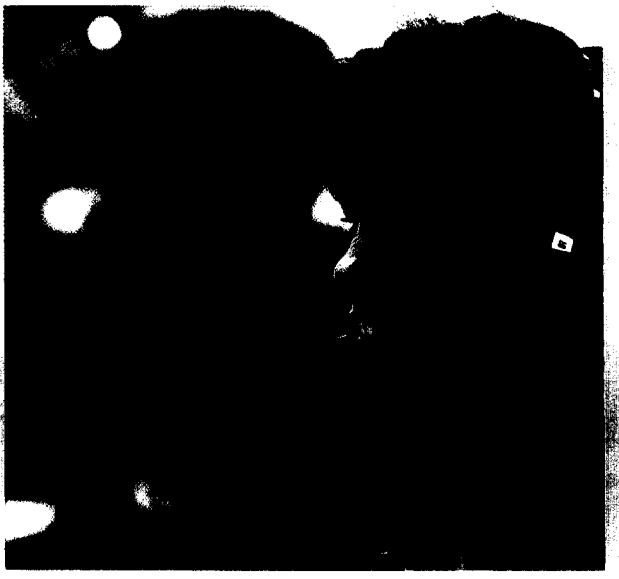
No Long-Term Service Contracts Required

No strings attached. Because Sprint Spectrum is so easy to activate, and because you shouldn't have to be "locked in" to a service you want, you don't need to sign a long-term service contract. Sprint Spectrum Service is here for as long as you want to use it. If for any reason you are not completely satisfied or wish to terminate service, just call Customer Care.

Hassle-Free Activation and Service

Anywhere, Anytime — Over-the-air activation. Sprint Spectrum is very easy to activate! One phone call to Customer Care is all it takes. Within minutes, Customer Care can turn on your service for the first time, add features, and build your account profile — completely over-the-air. There's nothing else like it in the industry.

This unique "over-the-air activation" is possible because all of your account information is stored on a "Smart Card" microchip in your handset. A Customer Care Representative can update information to the Smart Card instantly whenever you need.



Features and Benefits

Personalized Features and Services

Customized to You. With so many features and services available, Sprint Spectrum gives you all the options you need to tailor a personal communications system that is right for you. A Customer Care representative will work with you to assess the options and match them to your individual requirements.

Customer Care

Available 24-hours a day, 7 days a week. The Sprint Spectrum Customer Care Center is staffed round the-clock, every day. Friendly Customer Care representatives are available to handle all of your needs — from answering questions to checking your account status to arranging service changes. So you can make a change in your service at any time.

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Sprint Spectrum is technology at its best: Easy to use. Easy to learn. Simple in design. Convenient to your personal lifestyle. Sprint Spectrum has all the elements to help you manage your personal and business life.

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Sprint Spectrum Service Plans Include:

Free Airtime – All service plans have airtime included at no extra charge. So you can make calls when you want to without worry.

No Contract – Unlike cellular, Sprint Spectrum does not require that you sign a long-term contract.

Built-In Answering Machine – With your handset's built-in answering machine, you can stay in touch even if you can't answer your phone, or if it's busy or turned off. The answering machine automatically answers these calls, takes messages for you and saves them until you have time to listen to them.

Built-In Numeric Paging – Every handset includes built-in numeric paging at no extra charge. Callers can leave a phone number for you to call when you want to.

Built-In Caller ID – Every handset includes Caller ID at no extra charge. So you'll see the number of the person who is calling you before you answer. If you choose not to answer, the caller can leave you a message or a page.

Free Minute for Incoming Calls – The first minute of incoming calls is free – so you can give out your number and not worry about paying for calls you don't want to receive.

Great Rates on Sprint Long Distance – With Sprint Spectrum you get your choice of two great Sprint long-distance plans. Just tell Customer Care (when you sign up for service) whether you'd prefer Sprint Sense℠, which gives you 22¢ per minute peak and 10¢ per minute off peak, or "flat rate" pricing of 15¢ per minute, anytime – day or night.

Choose Your Number – In order to make your number easy to remember, Customer Care will try to match the last four digits of your number to those of your choice when you call to activate (subject to availability).

Choose Your Billing Cycle – You select the time of the month you want to receive your bill, so it arrives when you want it to.

Detailed Billing – Each invoice you receive is easy to read and will give you full detail of all call activity for the month.

Handset Replacement Program – Handset replacement protection is included with all service plans, except Talk 15 and Talk 30, so you automatically protect your investment. Handset Replacement Program is available on Talk 15 and Talk 30 for $4/month.

Customer Care Is Always There – Our friendly Customer Care Representatives are available 24 hours a day, seven days a week to help you. Call them to get answers to questions or change service plans. This call is always free – Dial 611 from your Sprint Spectrum handset or 1-800-311-4220 from any phone.

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Select the Sprint Spectrum Service Plan That's Right for You

		TALK 15	TALK 30	TALK 120	TALK 300	TALK 600	TALK 1200
	Monthly Package Price	$15	$25	$40	$60	$90	$150
FREE AIRTIME INCLUDED	Anytime	15 minutes	30 minutes	—	—	—	—
	Peak (7AM - 9PM WEEKDAYS)	—	—	60 minutes	150 minutes	300 minutes	600 minutes
	Off-Peak (ALL OTHER TIMES)	—	—	60 minutes	150 minutes	300 minutes	600 minutes
EXTRA MINUTES	Peak (7AM - 9PM WEEKDAYS)	31¢	31¢	29¢	27¢	26¢	25¢
	Off-Peak (ALL OTHER TIMES)	31¢	10¢	10¢	10¢	10¢	10¢
FEATURES INCLUDED	Answering Machine	Yes	Yes	Yes	Yes	Yes	Yes
	Numeric Paging	Yes	Yes	Yes	Yes	Yes	Yes
	Caller ID	Yes	Yes	Yes	Yes	Yes	Yes
	Call Waiting	Optional	Optional	Optional	Yes	Yes	Yes
	Handset Replacement Program	Optional	Optional	Yes	Yes	Yes	Yes

Whether you want Sprint Spectrum service to help manage your work or personal life, or as a safeguard for emergencies, you'll find that Sprint Spectrum does much more for you than today's cellular services for much less than cellular costs. Each service plan includes free airtime.

Talk 15 – The "Starter Package." What a great way to get to know Sprint Spectrum. It's the way to take advantage of the benefits Sprint Spectrum has to offer at the lowest possible monthly charge. For only $15 per month you're on the network. And, unlike cellular starter packages, this one includes a full 15 minutes of anytime airtime, so you can talk when you want to – day or night, weekdays or weekends. Additional minutes are 31¢ per minute, anytime, day or night. Talk 15 also includes a built-in answering machine, numeric paging and Caller ID, so you're always "in touch."

Talk 30 – For only $25 per month, you've got a plan that includes 30 minutes of anytime airtime, so you can talk when you want to – day or night, weekdays or weekends. Additional minutes are 31¢ per peak minute and only 10¢ per off peak minute. Talk 30 also includes a built-in answering machine, numeric paging and Caller ID.

Talk 120 – This plan includes 60 minutes of peak airtime plus 60 minutes of off-peak. Additional minutes are 29¢ peak and 10¢ off-peak. Talk 120 includes a built-in answering machine, numeric paging and Caller ID. Plus, you are automatically protected with a Handset Replacement Program at no extra cost.

Talk 300 – This plan includes 150 minutes of peak time and 150 minutes of off-peak. Additional minutes cost only 27¢ peak and 10¢ off-peak. Talk 300 includes a built-in answering machine and numeric paging, Caller ID and Call Waiting at no charge. Plus, you are automatically protected with a Handset Replacement Program at no extra cost.

Talk 600 – This is the perfect plan for frequent talkers. It includes 300 peak and 300 off-peak minutes, so it is easy to be in touch when you need to. Additional minutes are only 26¢ peak and 10¢ off-peak. Talk 600 includes a built-in answering machine and numeric paging, Caller ID and Call Waiting at no extra charge. Plus, you are automatically protected with a Handset Replacement Program at no extra cost.

Talk 1200 – This is the perfect choice for people who make and receive lots of calls. As the top-of-the-line plan, it includes a whopping 600 minutes of peak time and 600 minutes of off-peak. Should you need additional minutes, they are priced at our absolute lowest rate – only 25¢ peak and 10¢ off-peak. Talk 1200 includes a built-in answering machine, numeric paging, Caller ID and Call Waiting at no extra charge. Plus, you are automatically protected with a Handset Replacement Program at no extra cost.

Corporate Service Plans – Available for accounts with five or more subscribers. Call 1-800-311-4220 for more information.

All rates and policies are subject to change with reasonable advance notice.

SPRINT SPECTRUM ADDITIONAL SERVICES	
Directory Assistance with Call Completion (Dial 411)	50¢/call
On-Demand Information Services Traffic, News, Financial News, Sports, Weather, Horoscope, Lottery (Dial "INFO)	50¢/minute
Landline Connection Charge For completed local landline calls	10¢/call

Sprint Spectrum Optional Features:
Call Customer Care to Activate

INFORMATION SERVICES	
Daily **Handset Delivered Services** Sports, Weather, Horoscope, Lottery	$6/month
Twice Daily **Handset Delivered Services** Traffic, News, Financial News	$12/month
Financial Portfolio **Custom Stock Tracking** **Delivered Services** (Call for Details)	$25/month

FEATURES	
Voicemail	$2/month
Call Waiting (Talk 15, Talk 30 and Talk 120)	$2/month
Call Forwarding	$2/month
Convenience Package Voicemail, Call Waiting, Call Forwarding	$5/month
Call Barring	$5/month
Handset Replacement Program (Talk 15 and Talk 30)	$4/month
Text Messaging Includes 100 PC or handset-generated messages	$10/month
Additional messages	10¢/message
Operator assisted messages	50¢/message